



THE COUNCIL OF ORGANIZATIONAL REPRESENTATIVES
ON NATIONAL ISSUES CONCERNING PEOPLE WHO ARE DEAF OR HARD OF HEARING

January 11, 2002

Margie Roman Salas
Office of the Secretary
Federal Communications Commission
445 12th Street, S.W., TW-A325
Washington, DC 20554

Re: Notice of Proposed Rulemaking Regarding the Proposed Elimination of the
Exemption of Public Mobile Service Phones from the Hearing Aid Compatibility
Act of 1988

WT Docket No. 01-309, RM-8658
FCC 01-320, released November 14, 2001

Dear Secretary Salas:

The members of the Council of Organizational Representatives on National Issues Concerning People who are Deaf or Hard of Hearing (COR), by and through the undersigned co-chairs, submit these comments in the above-captioned matter.

COR urges the Federal Communications Commission (the "Commission") to revoke the current exemption for digital wireless telephones and require that all wireless services be required to be accessible to hearing aid users compatible with the same level of service that hearing customers enjoy. Such a ruling would benefit people with hearing loss, serve the public good, and reflect the use of existing compatible technology. Because there currently exist several [models of digital wireless telephones which are either compatible or have very limited interference with hearing aids, it is clear that it is technologically feasible to make and sell digital wireless telephones which are compatible with hearing aids, in this marketplace](#). Customers with hearing loss must be able to use the full range of existing and potential features (i.e. text messaging, voicemail, caller ID, etc.) without interference to a hearing aid, with the use of a telecoil. Requiring that all digital wireless technology be compatible with hearing aids would not make manufacturers uncompetitive, as current sales show. If necessary, full compatibility of multiple products could be phased in over a two-year period to [minimize any potential disruption in the marketplace](#).

Hard of hearing and deaf consumers recognize and acknowledge that market forces play a significant part in the telecommunications arena, so the implementation of hearing aid compatible digital wireless telephones could be done on a graduated schedule. Two years for phased-in compliance is more than reasonable, especially given that voluntary compatibility has been an issue since 1988, and the current exemption has been in effect for six years.

Secretary Margie Roman Salas

January 11, 2002

Page two

A graduated implementation schedule would allow consumers to get existing functionally compatible digital wireless telephones immediately, with two years for industry to continue developing additional new compatible digital wireless product lines.

For all of the foregoing reasons, COR urges the Commission to revoke the exemption currently in place for digital wireless telephones and require that they must be compatible with hearing aids. Such an action would benefit people with hearing loss, serve the public good by increasing access to telecommunications for all Americans, be technologically feasible, and be competitive in the marketplace. *Persons with hearing loss want access and a variety of choices, just like everyone else.*

If the interests of people with hearing loss are to be safeguarded, and access to telecommunications by people with hearing loss is to be preserved, the Commission must revoke the exemption for digital wireless telephones and services, and require that they **MUST** be compatible with hearing aids.

Respectfully submitted,



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